

Exhibit H

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

AMENTUM ENVIRONMENT & ENERGY,
INC.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 20-2016 C
Judge Silfen

JOINT MOTION TO MODIFY THE SCHEDULING ORDER

The parties, plaintiff Amentum Environment & Energy, Inc., formerly known as URS Energy & Construction, Inc. (“URS”), and defendant the United States of America (the “Government”), respectfully move the Court for the entry of a modified Scheduling Order. Despite substantial progress on fact discovery, the parties respectfully believe that they require additional time beyond the current deadline of March 14, 2025, in which to complete the fact discovery. Accordingly, the parties respectfully request a modest extension of 10 weeks (70 days) of the deadline for the close of fact discovery and modification of subsequent deadlines to otherwise maintain the prior case timeline. Both parties further agree to provide proposed deposition dates for the remaining depositions no later than March 21, 2025, and to cooperate in scheduling those depositions, including proposing alternate dates if proposed dates do not work for the other party. The parties intend to avoid seeking ~~Neither party will seek~~ any further extension to the below schedule ~~for any reason~~, except on the basis of unforeseen, extraordinary circumstances, and in such circumstances the parties will endeavor to seek only an extension that will be no greater than strictly necessary to allow for those circumstances to be addressed. This is the parties’ second request for a modification of the scheduling order.

Therefore, the parties jointly submit the following proposed schedule for the Court's approval.

Event	Deadline
Close of fact discovery	May 23, 2025
Joint status report due that updates the court on a first settlement discussion	June 13, 2025
Exchange of expert reports	July 18, 2025
Exchange of rebuttal expert reports	September 12, 2025
Close of expert discovery	November 7, 2025
Joint status report due that (1) updates the court on a second settlement discussion, and (2) proposes a schedule for further proceedings. The dispositive-motion briefing schedule shall include four deadlines: (1) URS's affirmative motion; (2) the government's cross-motion and response; (3) URS's response and reply; and (4) the government's reply.	November 21, 2025

This request is made as a result of the fact-intensive and wide-ranging nature of the case, coupled with current resource constraints faced by the Government. The claims in this case span nearly a decade, and deal with many different aspects of a large nuclear decontamination and decommissioning project. As such, the parties still have approximately nine depositions to schedule and take, and are unable to complete this in the time currently allotted. The Government is also currently facing limitations resulting from reduced staffing and increased caseloads. The parties continue to work diligently to complete fact discovery as expeditiously as possible.

For these reasons, the parties respectfully request that the Court adjust the scheduling order as recited above.

Respectfully submitted,

s/ ~~DRAFT~~

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Dated: March 12, 2025

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Case No. 20-2016-C
Judge Silfen

~~[PROPOSED] REVISED DISCOVERY SCHEDULING ORDER~~

~~On October 17, 2024, the Court issued an order setting a revised discovery schedule in this case. ECF No. 57. On March 13, 2025, the parties filed a Joint Motion to Modify the Scheduling Order. The parties explained that, in spite of their best efforts, the breadth of this case and resource limitations faced by the government necessitate additional time to complete fact discovery. The parties therefore jointly propose a new revised schedule for discovery that will allow for the completion of fact discovery and expert discovery with no further extensions.~~

The Court **GRANTS** the request and issues the following revised schedule

Event	Deadline
Close of fact discovery	May 23, 2025
Joint status report due that updates the court on a first settlement discussion	June 13, 2025
Exchange of expert reports	July 18, 2025
Exchange of rebuttal expert reports	September 12, 2025
Close of expert discovery	November 7, 2025

Joint status report due that (1) updates the court on a second settlement discussion, and (2) proposes a schedule for further proceedings. The dispositive motion briefing schedule shall include four deadlines: (1) plaintiff's affirmative motion; (2) the government's cross motion and response; (3) plaintiff's response and reply; and (4) the government's reply.	November 21, 2025
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The parties are further ~~ordered~~ to continue to jointly submit a status report on the every-30 day schedule through the close of expert discovery, the last one due on November 21, 2025.

Neither party will seek—and this Court will not grant—any further extension to the above schedule for any reason, except on the basis of unforeseen, extraordinary circumstances, and in such circumstances the extension will be no greater than strictly necessary to allow for those circumstances to be addressed.

~~IT IS SO ORDERED.~~

MOLLY R. SILFEN
Judge